

EXHIBIT B

CASE NAME: UBER; USDC CASE NUMBER 3:23-md-03084-CRB

1 ALLYSON BROWNE (SBN 295139), pro hac vice
2 1730 Clement Street
3 San Francisco, CA. 94121
Telephone: (678) 938-3445
Email: Allysonbrowne11@gmail.com

4 Attorney for 7x7 EXPERIENCE

5 UNITED STATES DISTRICT COURT

6 NORTHERN DISTRICT OF CALIFORNIA

7 IN RE: UBER TECHNOLOGIES, INC., PASSENGER Civil Action. No. 3:23-md-03084-CRB
SEXUAL ASSAULT LITIGATION

8 THIS DOCUMENT REALTES TO: ALL CASES

9 OBJECTIONS OF 7X7 EXPERIENCE TO
SUBPOENA DUCES TECUM

10 Pursuant to Federal Rules of Civil Procedure [“FRCP”] Rule 45(d)(2)(B), 7X7
11 EXPERIENCE [“7x7”] objects to Plaintiffs’ subpoena duces tecum on the following grounds:

12 7x7 is informed and believes that plaintiffs failed to comply with the requirements of
13 FRCP Rule 45(a)(1)(D)(4) and 45(b)(1) in that plaintiffs failed to serve notice and a copy of the
14 subpoena on each party in advance of service on 7x7; and, plaintiffs failed to serve notice on
15 7x7. (*Biocore Med. Technologies, Inc. v. Khosrowshahi*, 181 FRD 660, 667 (D KS 1998);
16 *Pagan-Colon v. Walgreens of San Patricio, Inc.*, 264 F.R.D. 25, 28 (D.P.R. 2010).)

17 The subpoena is overly broad, unduly burdensome and oppressive in purporting to
18 require production of documents in an unreasonably short time period (9 business days).

19 7x7 objects to the categories of documents listed in Schedule A of the subpoena as
20 follows:

21 1. This category objected to on the grounds that it is overly broad, unduly burdensome
22 and oppressive. This category is also objected to on the grounds that it is vague and
23 ambiguous. This category is also objected to on the grounds that it seeks production
24 of competitively sensitive trade secret information, the disclosure of which could be
25 26 27 28

OBJECTIONS OF 7X7 EXPERIENCE TO SUBPOENA DUCES TECUM - 1

1 highly damaging to 7x7's business. This category is also objected to on the grounds
2 that it invades the privacy of third parties.

3 2. This category objected to on the grounds that it is overly broad, unduly burdensome
4 and oppressive. This category is also objected to on the grounds that it is vague and
5 ambiguous. This category is also objected to on the grounds that it seeks production
6 of competitively sensitive trade secret information, the disclosure of which could be
7 highly damaging to 7x7's business. This category is also objected to on the grounds
8 that it invades the privacy of third parties.

9 3. This category objected to on the grounds that it is overly broad, unduly burdensome
10 and oppressive. This category is also objected to on the grounds that it is vague and
11 ambiguous. This category is also objected to on the grounds that it seeks production
12 of competitively sensitive trade secret information, the disclosure of which could be
13 highly damaging to 7x7's business.

14 4. This category objected to on the grounds that it is overly broad, unduly burdensome
15 and oppressive. This category is also objected to on the grounds that it is vague and
16 ambiguous. This category is also objected to on the grounds that it seeks production
17 of competitively sensitive trade secret information, the disclosure of which could be
18 highly damaging to 7x7's business.

19 5. This category objected to on the grounds that it is overly broad, unduly burdensome
20 and oppressive. This category is also objected to on the grounds that it is vague and
21 ambiguous. This category is also objected to on the grounds that it seeks production
22 of competitively sensitive trade secret information, the disclosure of which could be
23 highly damaging to 7x7's business.

24

CASE NAME: UBER; USDC CASE NUMBER 3:23-md-03084-CRB

6. This category objected to on the grounds that it is overly broad, unduly burdensome and oppressive. This category is also objected to on the grounds that it is vague and ambiguous. This category is also objected to on the grounds that it seeks production of competitively sensitive trade secret information, the disclosure of which could be highly damaging to 7x7's business.
7. This category objected to on the grounds that it is overly broad, unduly burdensome and oppressive. This category is also objected to on the grounds that it is vague and ambiguous. This category is also objected to on the grounds that it seeks production of competitively sensitive trade secret information, the disclosure of which could be highly damaging to 7x7's business.

DATED: 05/06/2024

Allyson Browne
ALLYSON BROWNE, ESQ., pro hac vice
Attorneys for Respondent, 7x7 EXPERIENCE

OBJECTIONS TO UBER CASE SUBPOENA

OBJECTIONS OF 7X7 EXPERIENCE TO SUBPOENA DUCES TECUM - 3

CASE NAME: UBER; USDC CASE NUMBER 3:23-md-03084-CRB

1 STATE OF CALIFORNIA, COUNTY OF SAN FRANCISCO

I am over the age of 18 years, and not a party to this action. My business address is 1730 Clement Street, San Francisco, California, 94121, which is in San Francisco County, California.

By 05/08/2024, the document named below will be served on the parties in this action as follows:

**DOCUMENT SERVED: OBJECTIONS OF 7X7 EXPERIENCE
TO SUBPOENA DUCES TECUM**

SERVED UPON: **SEE BELOW**

X (By Electronic Mail Where Indicated) I verify that the above-referenced document will be transmitted via electronic service to the parties named below on 05/07/2024.

X (By Personal Service) I verify that the above-referenced document will be personally served on the parties named below on or by 05/08/2024, with Proof of Service on the following page.

Allison Browne

By: Allyson Browne, Esq

By email & personal service:

SAMANTHA HOEFS
NIGH GOLDENBERG RASO & VAUGHN
275 Battery Street
29th Floor
San Francisco, CA 94111-3339
Phone: (612) 445-0202
Email: shoebs@nighgoldenbergs.com

CASE NAME: UBER; USDC CASE NUMBER 3:23-md-03084-CRB

1 AMENDMENT TO PROOF OF SERVICE

2 On May 7, 2024, Respondent 7x7 EXPERIENCE (“7x7”) attempted personal service of the documents named
3 below, on the party as specified on the subpoena duces tecum, but no such named party existed at the address
provided. Counsel for 7x7 was later notified by Plaintiff’s counsel as follows, via email:

4 "Service by email is fine with Plaintiffs. However, if you do still personally serve the objections, that is the office
address for co-lead counsel in the MDL at Leiff Cabraser."

6 Accordingly, Plaintiff has accepted service via email, and 7x7 will not pursue additional methods of service as to not further burden 7x7.

DOCUMENT SERVED: **OBJECTIONS OF 7X7 EXPERIENCE
TO SUBPOENA DUCES TECUM**

SERVED UPON: **SEE BELOW**

By email (service accepted):

SAMANTHA HOEFS
NIGH GOLDENBERG RASO & VAUGHN
Email: shoebs@nighgoldenberg.com

The signatories declare under penalty of perjury that this information is true.

Date: 05/07/2024

ALLYSON BROWNE, ESQ., pro hac vice
Attorneys for Respondent, 7x7 EXPERIENCE

OBJECTIONS OF 7X7 EXPERIENCE TO SUBPOENA DUCES TECUM - 5